

ATTACHMENT E

TDS Metrocom Billing Issues Submitted to the Public Service Commission of Wisconsin
(Docket # 6720-T1-183)

#	Issue Name	Description	When Discovered	Number of Occurrences and How Long?	Recurring	Contract Dispute	Was Issue Raised and/or Escalated?	Last Known SBC Position	Bill Credit?	Relief Sought
TDS-1	Fact that Access, Collocation and LEC Services Billing is not considered within the scope of SBCs Performance Measurements.	After months of work already under way, it has recently come to TDS Metrocom's attention that SBC has not been considering Access, Collocation or LEC Services Billing in the scope of performance measurements.	July 2003	N/A	N/A	TDS Metrocom does not believe that it is.	Yes. July 2003 via email to Jim Ehr.	As of July 23, SBC has not responded to our inquiry regarding this issue.	N/A	TDS Metrocom requests that in addition to a performance measure developed to capture such billing accuracy errors, that the following remedies get implemented by SBC: 1.) The inclusion of all aspects of billing into not only performance measurements, but all other initiatives currently under way currently as well as those in the future.
TDS-2	Change Management & Internal Controls	TDS Metrocom feels that there is lacking internal controls within SBCs Billing OSS as it relates to change management. For example, we have reason to believe that when there are changes required to their billing OSS due to either interconnection agreement amendments, tariff changes, commission orders, etc, that each of the required changes are not necessarily implemented correctly and/or in a timely manner.	Although TDS Metrocom has reason to believe that this issue has been valid for some time, we discovered specific examples of this issue in October 2002.	Specific to this issue, we do not have any idea as to the volume of these adjustments due to the fact that our research remains underway.	Under investigation	Under investigation	Yes. Via email with SBC in October 2002.	SBC has acknowledged that they had billed TDS Metrocom incorrectly due to change management events in the past.	Under investigation	TDS Metrocom requests that in addition to a performance measure developed to capture such billing accuracy errors, that the following remedies get implemented by SBC: 1.) The inclusion of all aspects of billing into not only performance measurements, but
TDS-3	Circuit to circuit reconciliation	Although TDS Metrocom is currently researching this issue, we have reason to believe that SBC is billing us for circuits that we no longer have, and had sent disconnect orders to them.	July 2003	Specific to this issue, we do not have any idea as to the volume of these adjustments due to the fact that our research remains underway.	Under investigation	Under investigation	No.	SBC has acknowledged that they had billed TDS Metrocom for disconnected circuits in the past.	Under investigation	TDS Metrocom requests that in addition to a performance measure developed to capture such billing accuracy errors, that the following remedies get implemented by SBC: 1.) Agreement by SBC to a collaborative effort between our two companies to reconcile circuit inventories. 2.) Audit of SBCs current process to assure that 100% of exceptions are corrected and invoices adjusted accordingly. 3.) Provide documentation of SBCs process in place to assure that future exceptions are prevented.
TDS-4	Claim Acknowledgement & Resolution Notice Inconsistency	SBC requires TDS Metrocom to complete detailed dispute claim forms, identifying line item disputes, by BAN, by Bill Date, etc. However, TDS Metrocom does not consistently receive either acknowledgement or resolution notices for each of our claims. We experience a variety of scenarios including: 1. Seeing adjustments on our invoices relating to claims, however we never received either an acknowledgement or a resolution notification. 2. We receive dispute claim resolutions for claims we submitted, however are not able to validate that the adjustment communicated with that resolution appeared on our invoice. 3. We receive dispute claim resolution notices for adjustments that we never submitted a claim for. 4. SBC does not consistently send acknowledgement or resolution notices to the same person that submitted the claim.	May 2003	Estimated in the hundreds.	Yes	TDS Metrocom does not believe that it is.	Yes. June 2003 via submission of issue to the Billing Sub Team Forum.	SBC has not yet communicated their position of this issue to TDS Metrocom.	N/A	TDS Metrocom requests that in addition to a performance measure developed to capture such billing accuracy errors, that the following remedies get implemented by SBC: 1.) Perform an audit to assure that each claim submitted to date by a CLEC gets an acknowledgement and resolution notice. 2.) Some periodic audit to monitor #1 above due to change management issues. 3.) Documented process illustrating how claims are received from a CLEC, a related acknowledgement notice is sent, the claim is worked by SBC, and finally, a resolution notice is sent.

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TDS-5	Dispute Claim Processing Timeliness	TDS Metrocom has been experiencing serious delays in the acknowledging as well as the resolution of billing claims.	September 2002	Nearly 100 Since August 2002	Yes	TDS Metrocom does not believe that it is.	Yes. February 2003 with SBC Account Management in a face-to-face meeting. Several occasions prior to this face-to-face meeting via phone conversations with SBC Account Management. Also submitted as an issue at the Billing Sub Team Forum.	SBC has communicated that TDS Metrocom has the ability to escalate each individual exception.	N/A	TDS Metrocom requests that in addition to a performance measure developed to capture such billing accuracy errors, that the following remedies get implemented by SBC: 1.) Perform an audit to assure that each claim submitted to date by a CLEC gets an acknowledgement and resolution notice. 2.) Some periodic audit to monitor #1 above due to change management issues. 3.) Documented process illustrating how claims are received from a CLEC, a related acknowledgement notice is sent, the claim is worked by SBC, and finally, a resolution notice is sent.
TDS-6	Calling Name Delivery Service (CNAM)	Charges are assessed to TDS Metrocom for the look up of calling name and number delivery. Charges are assessed at a switch/point code level. In November 2002, we received a large back bill from SBC for this activity. Issues we discovered with this invoice include, but not limited to, 1. Invoice contained 16 months worth of back billing. 2. SBC was billing us at inaccurate rates.	November 2002	Affected approximately 18 months worth of billing before it was finally corrected on our February 2003 invoice.	Not since January 2003	TDS Metrocom does not feel that it does.	Yes. Via numerous conversations and written communication with SBC Account Management as well as dispute claims filed as far back as December 2002.	SBC acknowledged the validity of our dispute claim and made the appropriate changes to their billing OSS.	Yes	TDS Metrocom requests that in addition to a performance measure developed to capture such exceptions to SBCs billing OSS, that the following remedies be implemented by SBC: 1. Perform an audit to assure that all exceptions are indeed identified. 2. Periodic audit to identify back sliding. 3. Audit to validate volume activity. 4. Documented process how CNAM activity is validated, charges are assessed and audited in case of a dispute.
TDS-7	Collocation Power	TDS Metrocom discovered that SBC was inappropriately billing us for collocation power. Specifically, SBC is not billing power based on usage as stated in our ICA. They are also charging us for redundant power.	May 2003	Exact number of occurrences is unknown at this time. This has affected SBCs billing accuracy ever since TDS Metrocom first started purchasing collocation power and continues with current billing.	Yes	SBC feels that it is.	Yes. Via numerous conversations and written communication with SBC Account Management including disputing these charges formally since June 2003.	SBC has yet to directly provide TDS Metrocom with a written position or acknowledge our dispute claim filed over 30 days ago. Only response has been in regulatory filings.	No	TDS Metrocom requests that in addition to a performance measure developed to capture such exceptions to SBCs billing OSS, that the following remedies be implemented by SBC: 1. Audit of SBCs current process to assure that billing associated with collocation power is charged according to our ICA. 2. Audit to identify 100% of exceptions to date, billing corrected going forward and all billing adjustments including associated LPCs adjusted. 3. Provide documentation of SBCs process in place to assure that future exceptions are prevented.
TDS-8	Loop Conditioning Rates	While TDS Metrocom disputes the assessing of conditioning charges in general, we have identified that SBC is charging incorrect rates for conditioning activity.	October 2002	Exact number of occurrences is unknown at this time as we continue to research our invoices to identify additional exceptions.	Yes	Potentially	Yes, informally via the course of our complaint filed with the Wisconsin PSC regarding Loop Conditioning.	This specific issue has not been addressed outside of the Loop Conditioning Complaint.	No	TDS Metrocom requests that in addition to a performance measure developed to capture such exceptions to SBCs billing OSS, that the following remedies be implemented by SBC: 1. Audit of SBCs current process to assure that 100% of exceptions are corrected and billing stopped and adjusted accordingly. 2. Provide documentation of SBCs process in place to assure that future exceptions are prevented.

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TDS-10	Double Billing Of Circuits	TDS Metrocom discovered that SBC was inappropriately billing us for a circuit on two different invoices.	May 2002	Exact number of occurrences is unknown at this time as we continue to research our invoices to identify additional exceptions. This specific exception caused billing accuracy errors for 5 months and took SBC 9 months to resolve.	Under Investigation	TDS Metrocom is not aware of any specific interpretation issues.	Yes. Via numerous conversations and written communication with SBC Account Management including disputing these charges formally since May 2002.	SBC has acknowledged the validity of our dispute claim	Yes	TDS Metrocom requests that in addition to a performance measure developed to capture such exceptions to SBCs billing OSS, that the following remedies be implemented by SBC: 1. Audit of SBCs current process to assure that 100% of exceptions are corrected and billing stopped and adjusted accordingly, including any associated LPCs. 2. Provide documentation of SBCs process in place to assure that future exceptions are prevented.
TDS-11	Design CO Construction, Customer Connection, Admin charges	TDS Metrocom discovered that SBC was inappropriately billing us for Design CO Construction, Customer Connection, Administrative type charges contrary to agreements between our two companies.	January 2003	Exact number of occurrences is unknown at this time. This has affected SBCs billing accuracy since October 2001 and continues with current billing.	Yes. Contrary to affidavits filed by SBC in March 2003 stating that they expected to resolve this issue within the next bill cycle, the problem continues with June invoices.	TDS Metrocom is not aware of any specific interpretation issues.	Yes. Via numerous conversations and written communication with SBC Account Management including disputing these charges formally since November 2002.	SBC has acknowledged the validity of our dispute claim, however after roughly 7 months, they continue to struggle to correct their billing OSS to resolve this issue.	Yes, but incomplete.	TDS Metrocom requests that in addition to a performance measure developed to capture such exceptions to SBCs billing OSS, that the following remedies be implemented by SBC: 1. Audit of SBCs current process to assure that 100% of exceptions are corrected and billing stopped and adjusted accordingly, including any associated LPCs. 2. Provide documentation of SBCs process in place to assure that future exceptions are prevented.
TDS-12	Direct End Office Trunks (DEOTs)	In April 2003, TDS Metrocom discovered that SBC was inappropriately billing us for direct end office trunks contrary to our ICA.	April 2003	Exact number of occurrences is unknown at this time. This has affected SBCs billing accuracy for 24 months and counting.	Yes. We continue to see these charges on our June 2003 invoices.	TDS Metrocom feels that it is, specifically, SBC not being able to consistently implement change management events related to interconnection agreements.	Yes. Via numerous conversations and written communication with SBC Account Management including disputing these charges formally since April 2003.	SBC has acknowledged the validity of our dispute claim, however struggles to correct it and make appropriate adjustments in a timely manner.	Yes.	TDS Metrocom requests that in addition to a performance measure developed to capture such exceptions to SBCs billing OSS, that the following remedies be implemented by SBC: 1. The correction of the root cause associated with this discovery so SBC terminates their billing of these charges. 2. Audit of SBCs current process to assure that 100% of exceptions are corrected and billing stopped and adjusted accordingly. 3. Provide documentation of SBCs process in place to assure that future exceptions are prevented.
TDS-13	Disconnected Circuits	TDS Metrocom discovered that SBC was inappropriately billing us for circuits we had previously sent disconnect orders on. These disconnect orders were from as far back as June 2002.	March 2003	Exact number of occurrences is unknown at this time. This has affected SBCs billing accuracy for roughly 11 months.	It was for 11 months worth of billing cycles. TDS Metrocom continues to research our invoices to identify additional exceptions.	TDS Metrocom is not aware of any specific interpretation issues.	Yes. Via numerous conversations and written communication with SBC Account Management including disputing these charges formally since March 2003.	SBC has acknowledged the validity of our dispute claim, however after roughly 3 months, they continue to struggle to correct the associated LPCs associated with this issue.	Yes, but incomplete.	TDS Metrocom requests that in addition to a performance measure developed to capture such exceptions to SBCs billing OSS, that the following remedies be implemented by SBC: 1. Audit of SBCs current process to assure that 100% of exceptions are corrected and billing stopped and adjusted accordingly. 2. Provide documentation of SBCs process in place to assure that future exceptions are prevented.

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TDS-14	Non existent documentation for adjustments	In addition to the numerous back billing by SBC to date, TDS Metrocom has been made aware that they will be making several hundred thousand dollars worth of adjustments made to our future invoices. The only supporting information we have regarding an explanation for these charges are a result of a phone conversation with our Account Manager. Even then, only a fraction of the supporting explanation for these adjustments was made available to us, of which were only provided verbally. To date, SBC has yet to honor our request for written documentation explaining these adjustments. Yet when TDS Metrocom disputes a charge on our invoice, we are required to provide the following supporting facts related to the dispute or the dispute claim will be rejected as incomplete: Account Identifier, Bill Date, Circuit ID, Claim Amount, Customer Comments, USOC.	Although TDS has had this general concern with unexplained, or lacking detail with adjustments, this latest example occurred in July 2003.	Specific to this issue, we do not have any idea as to the volume of these adjustments due to the lacking documentation provided by SBC and the timing of the discovery.	Under investigation	Under investigation	Yes. Via written request to SBC Account Management on July 14, 2003.	SBC has not yet provided TDS Metrocom with a position related to this issue.	TDS Metrocom is left in the position of having to wait to see the impacts of this issue on our future invoices.	TDS Metrocom requests that in addition to a performance measure developed to capture such billing accuracy errors, that the following remedies get implemented by SBC: 1.) Written documentation from SBC outlining, at minimum, what the adjustments are for, USOCs affected, rates used, the root cause for the adjustments. 2.) Audit of SBCs current process to assure that 100% of exceptions are corrected and invoices adjusted accordingly. 3.) Provide documentation of SBCs process in place to assure that future exceptions are prevented.
TDS-15	Early Termination Liability	On our January 13, 2003 invoice, SBC Assessed an early termination penalty for disconnecting a circuit a day early. The contract end date was on a Saturday and due to that, we requested a disconnect for that Friday.	February 2003	Exact number of occurrences is unknown at this time as we are only aware of one so far. This has affected SBCs billing accuracy for 3 months.	Under investigation	TDS Metrocom does not feel that it does.	Yes. Via a dispute claim in February 2003	SBC has adjusted our account.	Yes	TDS Metrocom requests that in addition to a performance measure developed to capture such exceptions to SBCs billing OSS, that the following remedies be implemented by SBC: 1. Documented process of how SBC differentiates between calendar days and business days when it comes to determining contract term dates.
TDS-16	Joint Sonets	In April 2002, TDS Metrocom discovered that SBC was inappropriately billing us for joint sonet facilities contrary to our ICA.	April 2002	Exact number of occurrences is unknown at this time. This has affected SBCs billing accuracy for 15 months and counting.	Yes. Contrary to SBC affidavits filed in March 2003 stating that they expect to close this issue within the next billing cycle, we continue to see these charges on our June 2003 invoices.	TDS Metrocom feels that it is, specifically, SBC not being able to consistently implement change management events related to ICAs.	Yes. Via numerous conversations and written communication with SBC Account Management including disputing these charges formally since November 2002.	SBC has acknowledged the validity of our dispute claim, however struggles to correct it and make appropriate adjustments in a timely manner.	Yes.	TDS Metrocom requests that in addition to a performance measure developed to capture such exceptions to SBCs billing OSS, that the following remedies be implemented by SBC: 1. Audit of SBCs current process to assure that 100% of exceptions are corrected and billing stopped and adjusted accordingly. 2. Provide documentation of SBCs process in place to assure that future exceptions are prevented.
TDS-17	Late Payment Charges (LPCs) / Interest	TDS Metrocom is expected by SBC to pay 100% of all charges billed by SBC by the due date on the invoice. Then, if we dispute any of the charges, we should dispute them after the fact. Combine this process with the lacking timeliness of SBCs billing dispute process, we are required to bear the financial risk. Additionally, when SBC does finally acknowledge the validity of a dispute claim of ours, they do not compensate us with interest on those funds. Due to this financial risk, that has no set duration, TDS Metrocom finds ourselves withholding payment for charges that we dispute. This causes LPCs to get assessed to our accounts. LPCs that we have to dispute on the back end once the dispute is resolved.	Since TDS Metrocom began ordering products from SBC, late 1997.	Exact number of occurrences is unknown although LPCs are automatically assessed to invoices with unpaid balances. It has been an issue ever since TDS Metrocom started purchasing products from SBC.	Yes	Yes and No. TDS Metrocom does not believe that SBC is in the position to be able to honor this section of our ICA.	Not formally	SBC expects TDS Metrocom to pay 100% of charges billed, regardless of accuracy, and dispute charges on the back end and wait for resolution.	N/A	TDS Metrocom requests that in addition to a performance measure developed to capture such billing accuracy errors, that the following remedies get implemented by SBC: 1.) SBC should be required to suspend the application of LPCs until a time determined by the Commission that SBCs Billing OSS has met an acceptable level. It is our understanding that other ROBCs (including Qwest) can control the automatic application of LPCs.

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TDS-18	Missing Residential/Business Identifier	There are separate code identifiers, MUJSE for Residential and MUJCE for Business, that SBC places on their bill to identify which circuits are entered into their system as Residential versus Business. TDS Metrocom has discovered recently that SBC is failing to consistently provide such identifier, preventing TDS Metrocom from validating SBCs invoice.	July 2003	Exact number of occurrences is unknown. Although we did not catch this until July 2003, we have examples appearing on our April 2003 invoices. We also have reason to believe that it had been happening prior to us catching it on our April 2003 invoices.	Yes	TDS does not believe it is.	Yes. July 2003 via email to the billing Area Manager.	As of July 23, SBC has not responded to our inquiry regarding this issue.	No	TDS Metrocom requests that in addition to a performance measure developed to capture such billing accuracy errors, that the following remedies get implemented by SBC: 1.) Audit to assure that 100% of exceptions are identified and corrected. 2.) Results of audit described in #1 above with TDS Metrocom. 3.) Some periodic audit to monitor #1 above due to change management issues. 4.) Documented process illustrating how this identifier is determined, placed on the bill, and validated. 5.) Comparison of different process' followed for retail compared to wholesale as it pertains to #4 above.
TDS-19	Multiple Monthly Recurring Charges (MRC) as a single Non-Recurring Charge (NRC)	TDS Metrocom discovered that SBC was placing on our non recurring charges section of our invoice, a single charge that consisted of multiple months worth of monthly recurring charges (MRC). In some cases, there were up to 37 months worth of MRCs listed as a single NRC charge. Issues due to this issue include, but not limited to; 1. SBC back billing more than 3 years worth of activity. 2. Need for extensive validation activity by TDS Metrocom.	October 2003	Exact number of occurrences is unknown at this time. This has affected SBCs billing accuracy as far back as 1999. We continue to research to see if this issue continues to happen.	Under investigation	TDS Metrocom does not feel that it does.	Yes. Via numerous conversations and written communication with SBC Account Management since October 2002.	After bringing this issue to SBCs attention roughly 9 months ago, we have yet to see any progress made by SBC to rectify this issue.	Not that we are aware of.	TDS Metrocom requests that in addition to a performance measure developed to capture such exceptions to SBCs billing OSS, that the following remedies be implemented by SBC: 1. Perform audit of SBCs current process to assure that SBC is billing activity on a timely basis. 2. Perform an audit to assure that all exceptions are indeed identified. 3. Periodic audit to identify back sliding. 4. Audit to validate that all appropriate adjustments to billing have been made. 5. Documented process how circuits are entered into the SBC systems, billed and audited in case of a dispute. 6. Documented differences in how similar exceptions are cared for when the same thing happens on the retail side.
TDS-20	Dispute Single Adjustments Vs Multiple Adjustments	SBC requires TDS Metrocom to complete detailed dispute claim forms, identifying line item disputes, by BAN, by Bill Date, etc. However, TDS Metrocom has experienced situations when SBC acknowledges adjustments that need to be made to our account, they request that we allow them to place a lump sum credit on a single BAN as opposed to making the adjustments to the individual BANs that the charges were applied to. This creates unnecessary resource time on our part to make accounting adjustments on our side to account for this.	February 2003	N/A	Yes	TDS Metrocom does not believe that it is.	Yes. February 2003 via phone discussions with SBC Account Management.	SBC prefers to place adjustments on TDS Metrocoms invoice via one lump sum on a single BAN when available.	N/A	TDS Metrocom requests that in addition to a performance measure developed to capture such billing accuracy errors, that the following remedies get implemented by SBC: 1.) SBC be required to make adjustments to CLECs invoices consistent with the manner of which charges are assessed (By BAN)
TDS-21	Collocation Disconnections	TDS Metrocom discovered that SBC was inappropriately billing us for collocation products we had previously sent disconnect orders on. These disconnect orders were from as far back as December 2002.	February 2003	Exact number of occurrences is unknown at this time. This has affected SBCs billing accuracy for roughly 5 months.	It was for 5 months worth of billing cycles.	TDS Metrocom is not aware of any specific interpretation issues.	Yes. Via numerous conversations and written communication with SBC Account Management including disputing these charges formally since February 2003.	SBC has acknowledged the validity of our dispute claims.	Yes, however we are still in the process of validating that 100% of the necessary charges, including LPCs have been adjusted on our invoices.	TDS Metrocom requests that in addition to a performance measure developed to capture such exceptions to SBCs billing OSS, that the following remedies be implemented by SBC: 1. Audit of SBCs current process to assure that 100% of exceptions are corrected and billing stopped and adjusted accordingly. 2. Provide documentation of SBCs process in place to assure that future exceptions are prevented.

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TDS-22	Outstanding Late Payment Charges (LPCs)	TDS Metrocom discovered that SBC was inappropriately billing us for late payment charges associated with charges that had previously been adjusted.	December 2001	Exact number of occurrences is unknown at this time as we continue to research our invoices to identify additional exceptions. This specific exception has taken SBC 16 months and counting to resolve.	Yes	TDS Metrocom is not aware of any specific interpretation issues.	Yes. Via numerous conversations and written communication with SBC Account Management including disputing these charges formally since January 2003.	SBC has acknowledged the validity of our dispute claim, however TDS Metrocom has not received documentation showing that 100% of the required adjustments have been made to our accounts.	Yes, but incomplete.	TDS Metrocom requests that in addition to a performance measure developed to capture such exceptions to SBCs billing OSS, that the following remedies be implemented by SBC: 1. Audit of SBCs current process to assure that 100% of exceptions are corrected and billing stopped and adjusted accordingly. 2. Provide documentation of SBCs process in place to assure that future exceptions are prevented.
TDS-23	Proactive Prevention	Due to the numerous issues discovered within SBCs Billing OSS to date, TDS Metrocom has been attempting to avoid disputes in the future. Specifically, we have been attempting, since April 2003, to obtain written confirmation from SBC, pricing of a limited set of DS-3 products prior to ordering them. To date, we have yet to receive written confirmation from SBC exactly what the pricing would be.	April 2003	Number of occurrences is not applicable to this issue. It has been ongoing for 3 months.	Yes. Each day that TDS Metrocom is not able to resolve this issue, we are not able to service potential customers.	TDS Metrocom continues to try to work this with SBC.	Numerous phone conversations and emails with SBC Account Management since April 2003.	SBC continues to avoid providing TDS Metrocom with written confirmation of pricing related to these products.	N/A	SBC should be required to honor our request for written confirmation of product pricing.
TDS-24	Resale Termination Liability	TDS Metrocom discovered that SBC charged us for an end users termination liability. 2. SBC was billing us at inaccurate rates.	February 1999	Exact number of occurrences is unknown at this time as we are only aware of one so far. This has affected SBCs billing accuracy as far back as 1999.	Under investigation	TDS Metrocom does not feel that it does.	Yes. Via numerous conversations and written communication with SBC Account Management since February 1999.	SBC had sustained our dispute claiming that since we ordered the customer "Assume As Is", that we also assumed the end users termination liability.	No	TDS Metrocom requests that in addition to a performance measure developed to capture such exceptions to SBCs billing OSS, that the following remedies be implemented by SBC: 1. Perform audit of SBCs current process to assure that SBC has not billed carriers for end users termination charges. 2. Provide results of audit to affected carriers. 3. Documented process of how a retail customers billing is affected when a customer converts from retail to a CLEC. 4. Periodic audit to identify back sliding.
TDS-25	Residential-Business Loop Misclassification	TDS Metrocom discovered that SBC was taking residential orders and coding them as business in their systems. Not until roughly 7 months after we brought this to SBCs attention did they finally started making adjustments to our invoices and sent out Accessible Letter CLECAM03-197 to alert other affected carriers. Issues due to this misclassification include, but not limited to; 1. Data integrity issues within SBCs records. 2.SBC was billing us at inaccurate rates.	October 2002	Approximately 16k loops. Accordingly to SBC's Accessible Letter, this was a recurring problem for approximately 9 months (April 20, 2002 until November 9, 2002).	Yes it continues with our current invoices.	TDS Metrocom does not feel that it does.	Yes. Via numerous conversations and written communication with SBC Account Management since October 2002.	SBC acknowledged the validity of our claim.	Yes, although additional adjustments are required due to the fact that it continues to occur.	TDS Metrocom requests that in addition to a performance measure developed to capture such exceptions to SBCs billing OSS, that the following remedies be implemented by SBC: 1. Perform an audit to assure that all exceptions are indeed identified. 2. Periodic audit to identify back sliding. 3. Audit to validate that all appropriate adjustments to billing have been made. 4. Documented process how circuits are entered into the SBC systems, billed and audited in case of a dispute.

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TDS-26	Trouble Isolation Charges (TIC)	"TIC" type charges are charges assessed by SBC to CLECs when SBC field technicians code trouble tickets indicating that they were not able to isolate the trouble to SBC's side of the network. These type of charges generally are assessed using three different USOCs that we are aware of, VRP, MVV and ALK. MVV and ALK are time and material type charges and VRP is a trouble isolation type charge. TDS Metrocom has identified several issues as it relates to SBC's billing of "TIC" type of activity including, but not limited to: Incorrect rates, inappropriate charges (i.e. charged when we should not have been), Double billing and Incomplete billing.	April 2002	TDS Metrocom continues to discover exceptions, however has seen thousands to date. Exceptions data as far back as 1999.	Yes	TDS Metrocom does not feel that it does.	Yes. Via numerous conversations and written communication with SBC Account Management.	SBC has recognized Yes in the past that "TIC" charges assessed were invalid.	Yes	TDS Metrocom requests that in addition to a performance measure developed to capture such exceptions to SBC's billing OSS, that the following remedies be implemented by SBC: 1. Rate table audit to assure that rates for "TIC" type USOCs are accurate. 2. Improvements made to SBC's billing OSS to populate the date that the work was completed that constituted the charge. 3. Periodic audit to capture double billing. 4. Documented process how "TIC" type charges are determined, validated, billed and finally, audited in case of a billing dispute. 5. Provide a documented comparison of wholesale process compared to retail process for #4 above.
TDS-27	Inclusion of Billing Sub Team Forum Issues	TDS Metrocom believes that the issues completed to date, under investigation and future issues need to be incorporated into this Docket proceeding.	N/A	N/A	N/A	N/A	N/A	N/A	N/A	TDS Metrocom requests that the Billing Sub Team collaborative process and its work to date, and work to be completed in the future, be included into this proceeding.
TDS-28	Lack of proactive efforts by SBC to ensure accuracy of bills and efficiency of billing processes	TDS Metrocom has spent countless resources making improvements to SBC's Billing OSS as opposed to SBC, as the vendor, proactively providing adequate service. Examples include: 1. TDS Metrocom auditing and identifying exceptions to SBC's invoices (incorrect rates, double billing, etc). 2. Managing and escalating the progress of dispute claims submitted. 3. Identifying gaps in current performance measurements related to billing. 4. Identifying areas for improvements in billing dispute claim process.	Since TDS Metrocom first started purchasing products from SBC, late 1997	N/A	Yes	TDS Metrocom does not believe that there is.	Yes. Informally with SBC Account Management through out the term of our interconnection agreement.	SBC has repeatedly claimed formally that billing issues have either been single one-time occurrences, or exceptions due to underlying operational gaps as opposed to inefficiencies in their billing OSS.	N/A	TDS Metrocom requests that in addition to a performance measure developed to capture such billing accuracy errors, that the following remedies get implemented by SBC: 1.) Audit of SBC's current process to assure that 100% of exceptions are corrected and invoices adjusted accordingly. 2.) Provide documentation of SBC's process in place to assure that future exceptions are prevented.
TDS-29	Residential Discount	TDS Metrocom is not consistently getting the residential discount monthly recurring charge (MRC) on all residential circuits.	September 2002	TDS Metrocom continues to discover exceptions, however has seen thousands to date. Exceptions data as far back as April 2001.	Yes	TDS Metrocom does not feel that it does.	Yes. Via numerous conversations and written communication with SBC Account Management as well as dispute claims filed since October 2002.	SBC has yet to provide us a response to any of our dispute claims filed as far back as October 2002.	No	TDS Metrocom requests that in addition to a performance measure developed to capture such exceptions to SBC's billing OSS, that the following remedies be implemented by SBC: 1. Perform an audit to capture all residential circuits that are, or have been, charged the inaccurate MRC rate. 2. Issue appropriate billing adjustments required to address #1 above. 3. Correct necessary billing OSS to assure future billing is accurate. 4. Periodic audit to identify back sliding. 5. Documented process how residential discount MRC rates are applied to the appropriate residential circuits.
TDS-30	Toll Free Database Query	Charges are assessed to TDS Metrocom for the look up of terminating telephone numbers associated with toll free numbers. Charges are assessed at a switch/point code level. In October 2002, we received the first invoice from SBC for this activity. Issues we discovered with this invoice include, but not limited to; 1. Invoice contained 12 months worth of back billing. 2. SBC was billing us for activity that did not belong to us. Of the 19 point codes that SBC was billing us for, only 8 of them were actually ours. The other 9 belonged to other companies, yet SBC was billing us for them.	October 2002	Thousands. This was a problem affected approximately 17 months worth of billing before it was finally corrected on our March 2003 invoice.	Not since February 2003.	TDS Metrocom does not feel that it does.	Yes. Via numerous conversations and written communication with SBC Account Management as well as dispute claims filed as far back as October 2002.	SBC acknowledged the validity of our dispute claim and made the appropriate changes to their billing OSS.	Yes	TDS Metrocom requests that in addition to a performance measure developed to capture such exceptions to SBC's billing OSS, that the following remedies be implemented by SBC: 1. Perform an audit to assure that all exceptions are indeed identified. 2. Periodic audit to identify back sliding. 3. Audit to validate volume activity. 4. Document process of how Toll Free database query activity is validated, charges are assessed and audited in case of a dispute.

Note: Numbering based on PSCW proceeding. TDS-9 was deleted when found to be a duplicate issue.

TDS Metrocom Billing Issues Submitted to the Public Service Commission of Wisconsin

(Docket # 6720-TI-183)

#	Issue Name	Description	When Discovered	Number of Occurrences and How Long?	Recurring	Contract Dispute	Was Issue Raised and/or Escalated?	Last Known SBC Position	Bill Credit?	Relief Sought
TDS-31	Transit Rates	TDS Metrocom identified that SBC was charging incorrect rates related to Transit activity.	June 2003	Exact number of occurrences is unknown at this time. SBC has already acknowledged that they were billing us the incorrect rate for atleast 16 months	Until we see our July 2003 invoices, we have reason to assume that it is.	TDS Metrocom does not feel that it does.	Yes in June 2003 via written communication with SBC	SBC has acknowledged the validity of our claim. We continue to wait and see if the appropriate adjustments get made to our accounts.	Not yet.	TDS Metrocom requests that in addition to a performance measure developed to capture such exceptions to SBCs billing OSS, that the following remedies be implemented by SBC: 1. Audit of SBCs current process to assure that 100% of exceptions are corrected and billing stopped and adjusted accordingly. 2. Provide documentation of SBCs process in place to assure that future exceptions are prevented.
TDS-32	Unexplained Charges	TDS Metrocom identified charges that do not have explanations as to what they are for other than a description of "Customer Audit Number 2002".	July 2003	Exact number of occurrences is unknown at this time as we continue to research our invoices to identify additional exceptions.	Yes	TDS Metrocom does not feel that it does.	Yes in July 2003 via written communication with SBC.	SBC has yet to respond with an adequate explanation of these charges.	No	TDS Metrocom requests that in addition to a performance measure developed to capture such exceptions to SBCs billing OSS, that the following remedies be implemented by SBC: 1. Provide complete and accurate billing in order for us to validate these and all charges assessed to our account. 2. Provide documentation of SBCs process in place to assure that future exceptions are prevented.
TDS-33	USOC Changes	TDS Metrocom identified that certain USOCs associated with collocation rate elements are no longer showing up on our invoice, yet similar elements under different USOCs started to appear, with different rates. It appears that SBC is renaming a rate element under a different USOC and charging a different rate.	November 2002	Exact number of occurrences is unknown at this time as we continue to research our invoices to identify additional exceptions.	Yes	TDS Metrocom does not feel that it does.	Yes in October 2002 via written communication with SBC and through User Forum Billing Sub-team.	SBC initially responded saying that it was due to a tariff change, however we do not purchase these products out of a tariff. We purchase them out of our ICA. Also, the exception is only affecting one of our Michigan collocations.	No	TDS Metrocom requests that in addition to a performance measure developed to capture such exceptions to SBCs billing OSS, that the following remedies be implemented by SBC: 1. Audit to assure that not only accurate rates apply to billing, but also that tariff rates apply when appropriate and ICA rates apply when appropriate. 2. Periodic audit to monitor #1 above. 3. Provide documentation of SBCs process in place to assure that future exceptions are prevented. 4. Provide documentation showing how change management pertaining to rates get implemented into SBCs billing OSS. 5. Comparison of different process followed for retail compared to wholesale as it pertains to #4 above.
TDS-34	Volume Validation	While TDS Metrocom has already identified exceptions to SBCs billing in terms of rates charged, we continue to research the validation of the volume activity that SBC has been billing us.	Under Investigation	Under Investigation	Under Investigation	Under Investigation	No, under investigation	Under Investigation	N/A	Under Investigation